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Attorneys for Defendant
CIGNA BEHAVIORAL HEALTH, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SALOOJAS, INC.,

Plaintiff,

vs.

CIGNA HEALTHCARE OF CALIFORNIA,
INC.,

Defendant.

Case No. 3:22-cv-3270-CRB

**STIPULATION AND ~~[PROPOSED]~~
ORDER EXTENDING DEADLINE TO
RESPOND TO AMENDED COMPLAINT
PURSUANT TO CIVIL LOCAL RULES 6-
1 AND 6-2**

1 This Stipulation is entered into by and among Plaintiff Saloojas, Inc. (“Saloojas”) and
2 Defendant Cigna HealthCare of California, Inc. (“Cigna”), by and through their respective counsel.

3 WHEREAS, on June 3, 2022, Saloojas filed its Complaint in the United States District Court
4 for the Northern District of California, Case No. 3:22-cv-3270, *Saloojas, Inc. v. CIGNA Healthcare*
5 *of California, Inc.*;

6 WHEREAS, on October 6, 2022, the Court granted Cigna’s motion to dismiss and gave
7 Saloojas leave to file an amended complaint;

8 WHEREAS, on October 26, 2022, Saloojas filed its amended complaint (the “Amended
9 Complaint”);

10 WHEREAS, under Federal Rule of Civil Procedure 15, Cigna’s response to the Amended
11 Complaint is currently due on November 9, 2022;

12 WHEREAS, the parties have agreed to extend Cigna’s time to file its answer or otherwise
13 respond to the Amended Complaint to provide Cigna with additional time to investigate the
14 allegations in Saloojas’s Amended Complaint and to avoid overlap with the Thanksgiving holiday;

15 WHEREAS, the parties have not previously requested extensions with respect to Cigna’s
16 deadline to respond to the Amended Complaint;

17 WHEREAS, the parties do not anticipate that the requested time modification will have an
18 effect on the schedule for the case beyond the briefing schedule for Cigna’s response to the Amended
19 Complaint;

20 THEREFORE, it is hereby stipulated and agreed that, subject to Court approval:

- 21 1. Cigna shall file its answer or otherwise respond to the Amended Complaint on or
22 before **November 28, 2022**.

23 **IT IS SO STIPULATED AND AGREED.**

24 [signatures on following page]

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1 Dated: November 1, 2022

LAW OFFICE OF MICHAEL LYNN GABRIEL

2
3 By: /s/ Michael Lynn Gabriel

MICHAEL LYNN GABRIEL

4 Attorney for Plaintiff
5 SALOOJAS, INC.

6
7 Dated: November 1, 2022

MCDERMOTT WILL & EMERY LLP

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9 By: /s/ Dmitriy Tishyevich

DMITRIY TISHYEVICH

10 Attorneys for Defendant
11 CIGNA HEALTHCARE OF CALIFORNIA, INC.

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13 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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15 Dated: November 2, 2022



16 Hon. Charles R. Breyer
17 United States District Judge
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